

Comments on the Proposition 50, Chapter 8 IRWM Draft Grant Program Guidelines, Round 2

II. Introduction and Overview

C. Maximum Grant Amount (page 6)

According to the Draft Guidelines, DWR and the State Water Board are capping the implementation grant amount at \$25 million in Round 2. We suggest that the State may want to consider lowering that maximum amount in order to distribute funding to more regions throughout the State.

III. Eligibility Requirements

A. Eligible Grant Recipients (page 7)

The requirement that “other entities” may be part of a regional water management group (RWMG) responsible for applying for a grant and may perform work funded by the grant is a requirement that may not be possible to apply to all regions. Each region is developing different contractual requirements (and governance structure) in the formation of their RWMG that may not provide the flexibility for all “other entities” to become part of the RWMG. Ultimately there would be a lead grant administering agency within each region, such as the Flood Control District in the Greater Los Angeles County Region, that would contract with the State and with the project proponents to administer the grant. A project proponent could be an “other entity” that does not necessarily need to be part of a RWMG.

Shouldn't “local project sponsor” be defined in the guidelines?

C. Eligible Proposals/Project Types (page 8)

We would encourage the State to add a flood protection component. For example, planning and implementing multipurpose flood control programs that include removal of invasive non-native plants (or even sediment) for the purpose of increasing flood protection or improving water conservation or water quality.

Appendix A – IRWM Plan Standards

B. Region Description (page 14)

Section II. C. Maximum Grant Amount describes who may be eligible to apply but this section of the Appendix A allows room for argument as to what is or is not a region. We suggest that the language in Section II. C. be duplicated in this section of the Appendix for greater clarity.

L. Statewide Priorities (page 15)

Statewide Priorities is not one of the scoring criteria anymore; therefore, we recommend that DWR and SWRCB remove it from the IRWM Plan Standards.

Appendix C – Implementation Grants (page 20)

C.1 Attachment 4 – Disadvantaged Communities – Environmental Justice

The State added Environmental Justice into the scoring criteria in Round 2. More clarification regarding how the State defines Environmental Justice and what the State is looking for in that area would be very helpful.

Table C-5 – Step 2 Scoring Criteria and Scoring Standards (page 35)

Funding Match

Higher points are given for an increased funding match (beyond the 10% required match). This scoring gives smaller projects an advantage over larger, more costly projects since it's much easier to provide a 40% match for a \$100,000 project vs. a \$40 million project. The State may want to consider altering the scoring criteria to provide a more equitable point distribution or to have tiers of scores depending on project cost.

Exhibit 4 – Other Expected Benefits (page 53)

Flood Control

Flood control benefits are only considered in this section. Reduced maintenance costs are a valid economic benefit that should also be considered.